

**ATTACHMENT A: CITY OF BRAWLEY SUMMARY OF NONCOMPLIANCE RECORD**

Year	Description of Noncompliance/violation	Regional Board Action Taken
1999	Discharger violates and threatens violation of flow limitation of WDRs Order 99-014	Regional Board issues Time Schedule Order (TSO) 99-054, requiring Discharger to expand capacity by March 2002.
2000	Discharger violates toxicity limitations of WDRs Order 00-087. Discharger also in threatened violation of Pretreatment Program provisions of WDRs Order 00-087.	Board assesses \$3,000 in administrative civil liability (ACL) against the Discharger for violations.
2001	Discharger is in chronic violation of toxicity limitations of WDRs Order 00-087. Also violates Permit flow limit. Discharger also violates BOD and TSS Permit limitations and Monitoring and Reporting Requirements. Discharger also in threatened violation of Pretreatment Program provisions of WDRs Order 00-087.	Regional Board issues over 10 Non-compliance letters to Discharger, and asks Discharger to identify source of toxicity and take corrective action. Board also assesses \$6,000 in ACL against the Discharger for violations.
2002	Discharger in chronic non-compliance with toxicity limitations of WDRs Order 00-087. Discharger also violates TSO 99-054 by not completing expansion by deadline specified by Board. Discharger also in threatened violation of Pretreatment Program provisions of WDRs Order 00-087.	Regional Board assesses \$33,000 in ACL against Discharger for violations, but does not take additional enforcement against Discharger for violation of TSO.
2003	Discharger in chronic non-compliance with toxicity limitations of WDRs Order 00-087. It also violates BOD, TSS, and coliform Permit limitations. Discharger also in violation of Pretreatment Program provisions of WDRs Order 00-087.	Regional Board issues 10 Non-compliance letters to Discharger. Regional Board also issues \$33,000 ACL Complaint against Discharger.
2004	Discharger in chronic non-compliance with toxicity limitations of WDRs Order 00-087. Ammonia into WWTP a significant problem. Discharger also in violation of Pretreatment Program provisions of WDRs Order 00-087.	Regional Board assesses \$33,000 in ACL against Discharger for violations. Regional Board Executive Officer issues Cleanup and Abatement Order R7-2004-0079 requiring Discharger to upgrade WWTF and address chronic noncompliance with toxicity.

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2005	Discharger violates toxicity limits of WDRs 00-087 and Zinc and free cyanide limitations of WDRs Order R7-2005-0021. It also threatens violation of new ammonia limitations. Discharger also in violation of Pretreatment Program provisions of WDRs Order R7-2005-0021.	Regional Board cites Discharger for violations.
2006	Discharger violates Zinc and coliforms limitations of WDRs Order R7-2005-0021. It also violates monitoring and reporting requirements. Further, it threatens violation of ammonia limits and is in violation of Pretreatment Program provisions of WDRs Order R7-2005-0021.	Regional Board cites Discharger for effluent violations.
2007	Discharger violates bacteria and ammonia limits of WDRs Order R7-2005-0021. Discharger also fails to comply with tasks and deadlines prescribed by CAO R7-2004-0079. It is also in violation of Pretreatment Program provisions of WDRs Order R7-2005-0021.	Regional Board cites Discharger for 2006 coliforms violations and for ammonia violations.
2008	Discharger in chronic violations of WDRs Order R7-2005-0021. It also violates its monitoring and reporting requirements by not using a certified lab for analyses of bacteria.	Regional Board assesses \$483,750 in ACL against Discharger for violations of WDRs and CAO. Regional Board suspends most of the assessed liability by allowing the Discharger to direct \$256,875 towards SEPs. Regional Board also adopts Cease and Desist Order (CDO) R7-2008-0008 against Discharger. It also adopts Special Order to amend CDO to include interim ammonia limits.
2009	Discharger violates WDRs Order R7-2005-0021 and in threatened violation of Cease and Desist Order. Discharger violates coliform limits of WDRs Order R7-2005-0021.	Regional Board assesses \$16,000 in MMPs for ammonia violations that occurred in 2008. Regional Board issues Time Schedule Order R7-2009-0035, requiring Discharger to use certified lab for bacteria violations.

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2010	Discharger in violation of Cease and Desist Order and in violation of BOD, cyanide, and bacteria limits of WDRs Order R7-2010-0022.	Regional Board assesses \$16,000 in discretionary liability against Discharger for monitoring violations. Board suspends \$8,000 of the liability by allowing Discharger to complete a SEP.
2011	Discharger in chronic violation of CDO R7-2008-0008. It also violates BOD and bacteria limits of WDRs Order R7-2010-0022.	Regional Board Assistant Executive Officer issues ACL Complaint R7-2011-0013 (\$45,000), against Discharger for violations. This was rescinded to address additional violations.
2012	Discharger in chronic noncompliance with CDO R7-2008-0008. It also violates bacteria, free cyanide, and BOD effluent limits of WDRs Order R7-2010-0022.	Regional Board staff starts comprehensive investigation on all noncompliance issues.